



From: [Douglas Kelso](#)
To: [Columbia River Crossing](#)
CC:
Subject: Comments on Draft Environmental Impact Statement
Date: Tuesday, July 01, 2008 4:36:40 PM
Attachments:

P-0768-001 The contemplated alternatives are wholly inadequate. The "supplemental bridge" as proposed clearly is designed as a place-holder; a way to pretend to consider alternatives by presenting one that has no possibility of going forward. In effect, this document rigs the process by presenting the favored alternative and no reasonable alternatives for evaluation.

An environmental impact statement is designed to force consideration of reasonable alternatives. Unless the environmental impact statement presents a serious, reasonable alternative, the entire process will be flawed.

P-0768-002 The purpose stated of the project is to "a) improve travel safety and traffic operations on the Interstate 5 crossing's bridges and associated interchanges; b) improve connectivity, reliability, travel times and operations of public transportation modal alternatives in the BIA; c) improve highway freight mobility and address interstate travel and commerce needs in the BIA; and d) improve the Interstate 5 river crossing's structural integrity."

All of these goals ("improvement") can be achieved by congestion pricing on Interstate 5, turning one lane into an HOV/transit lane, improving the interchanges feeding into the bridge approach, and performing a seismic upgrade on the existing structure.

An even better approach is to create a serious "supplemental bridge" alternative and renovate the existing structures. However, no serious proposal for a supplemental bridge was set forth in the DEIS. A serious supplemental bridge alternative could involve either

(a) A six or eight lane elevated freeway bridge that carried three lanes of through traffic over the Columbia, with the two existing spans renovated for arterial traffic, bicycle traffic and transit, or

(b) A new arterial bridge to carry traffic between North Portland and downtown Vancouver as well as public transit and bicycle traffic.

As others have noted, the "bridge lift" issue can be addressed by adding a lift span to the

P-0768-001

The CRC Task Force - composed of 39 leaders from a broad cross section of Washington and Oregon communities – was tasked with advising the CRC project team, including federal sponsors, and providing guidance and recommendations at key decision points over the course of nearly 3 ½ years. Public agencies, businesses, civic organizations, neighborhoods and freight, commuter and environmental groups were all represented on the Task Force. The Task Force voted to develop a supplemental bridge alternative, in an attempt to find an alternative to total bridge replacement that would still meet the project's purpose and need but at lower cost and with greater reliance on managing demand with higher tolls and more transit service. The two most promising supplemental alternatives were considered in the DEIS. Based on the detailed analysis that followed, the Task Force recommended, and all project sponsors agreed, that the replacement bridge with light rail was the locally preferred alternative.

P-0768-002

The CRC Task Force - composed of 39 leaders from a broad cross section of Washington and Oregon communities – was tasked with advising the CRC project team and providing guidance and recommendations at key decision points. Public agencies, businesses, civic organizations, neighborhoods and freight, commuter and environmental groups were all represented on the Task Force. The Task Force voted to develop a supplemental bridge alternative, in an attempt to find an alternative to total bridge replacement that would still meet the project's purpose and need but at lower cost and with greater reliance on managing demand with higher tolls and more transit service. The two most promising supplemental alternatives were considered in the DEIS. Based on the detailed analysis that followed, the Task Force recommended, and all project sponsors agreed, that the replacement bridge with light rail was the locally preferred alternative.

- P-0768-002** | railroad bridge, allowing virtually all river traffic to pass beneath the hump of the existing bridge. The issue of moving freight up and down the West Coast can be addressed by routing the majority of freight traffic to I-205.
- P-0768-003** | The DEIS attributes the current crash rate to "traffic congestion and weaving movements associated with closely spaced interchanges." Fixing the interchanges on the approach, banning lane changes on the bridges, and congestion pricing to reduce traffic should be able to reduce the accident rate without the need for a new bridge.
- P-0768-004** | A separate arterial bridge could also handle traffic between Hwy 14 in Washington and Portland, thus potentially would allowing the removal of all freeway interchanges along I-5 between Mill Plain Boulevard and Marine Drive.
- The DEIS is fatally flawed because it has not put forth a reasonable supplemental bridge option that effectively re-uses the current bridge. Such reasonable alternatives should be placed alongside what clearly is the "preferred alternative" (a single 12 lane freeway bridge plus new light rail bridge, with no arterial lanes) in order to compare several genuinely reasonable alternatives.
- The current DEIS makes a mockery of the environmental impact process by offering one clearly preferred "alternative", three fake alternatives that are designed to be rejected, and "no action." There are other intermediate alternatives, including much less ambitious new bridges. The Final EIS should consider all reasonable alternatives.

Regarding freight, the Vancouver-Portland region is a trade hub, acting as a gateway and distribution center for domestic and international markets. The region has become a trade hub, in large part, because of its direct access to the freeway system, navigable rivers, rail lines, and international air shipping. The region's continued competitiveness as a trade hub is dependent on the ability to efficiently move freight on and between these transportation facilities. Though I-205 is a convenient, cost-effective route for some freight trips, it cannot replace the role of I-5 as a freight route. For many freight trips, I-205 would be out of direction, adding to travel time and shipping costs. In addition trucks will travel on I-5 because it is shorter and faster than I-205. In 2005, the I-5 Interstate Bridge carried approximately 3,240 more trucks per day or 42 percent more than the I-205 Glenn Jackson Bridge. Trucks try to avoid congestion and travel during uncongested periods and because the travel distance on I-5 from junction to junction is only 19.3 miles compared to 25.5 miles on I-205 trucks will travel on I-5. Increased shipping costs can have a significant impact on the overall costs of doing business in our region, making us less competitive and threatening our status as a trade hub.

P-0768-003

The evaluation of the five alternatives in the DEIS was preceded by an extensive evaluation and screening of a wide array of possible solutions to the CRC project's Purpose and Need statement. Chapter 2 of the DEIS (Section 2.5) explains how the project's Sponsoring Agencies generated ideas and solicited the public, stakeholders, other agencies, and tribes for ideas on how to meet the Purpose and Need. This effort produced a long list of potential solutions, many of which were non-auto oriented options such as various transit modes and techniques for operating the existing highway system more efficiently without any capital investment. These options were evaluated for whether and how they met the project's Purpose and Need, and the findings were reviewed by project sponsors, the public, agencies, and other

stakeholders. Alternatives that included only TDM/TSM strategies, or provided only transit improvements, would provide benefits, but could only address a very limited portion of the project's purpose and need. This extensive analysis found that in order for an alternative to meet the six "needs" included in the Purpose and Need (described in Chapter 1 of the DEIS), it had to provide at least some measure of capital improvements to I-5 in the project area. Alternatives that did not include such improvements did not adequately address the seismic vulnerability of the existing I-5 bridges, traffic congestion on I-5, or the existing safety problems caused by sub-standard design of the highway in this corridor. The DEIS evaluated alternatives with more demand management (higher toll) and increased transit service with less investment in highway infrastructure improvements (Alternatives 4 and 5) compared to the toll and transit service levels included in Alternatives 2 and 3. The additional service and higher toll provided only marginal reductions in I-5 vehicle volumes, and they came primarily at the cost of greater traffic diversion to I-205. This analysis found that a more balanced investment in highway and transit, as represented by Alternatives 2 and 3, performed considerably better on a broad set of criteria.

P-0768-004

See discussion above regarding the development of the supplemental bridge alternatives. Regarding arterial crossings, many different options for addressing the project's Purpose and Need were evaluated in a screening process prior to the development and evaluation of the alternatives in the DEIS. Options eliminated through the screening process included a new corridor crossing over the Columbia River (in addition to I-5 and I-205), an arterial crossing between Hayden Island and downtown Vancouver, a tunnel under the Columbia River, and various modes of transit other than light rail and bus rapid transit. Chapter 2 (Section 2.5) of the DEIS explains why a third corridor, arterial crossing, and several transit modes evaluated in screening were

dropped from further consideration because they did not meet the Purpose and Need.